

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

ALANNA DUNN

Plaintiff

v.

CUYAHOGA COUNTY, *et al.*

Defendants

Case No. 1:23-cv-00364

Judge Bridget Meehan Brennan

STATUS REPORT RE: RETENTION AGREEMENT

Pursuant to this Court's Case Management Order, the parties write concerning the status of the retention agreement that must be filed pursuant to paragraph seven of the E-Discovery Standard. (*See* ECF 21 at 2.) The parties have met and conferred on two separate occasions to discuss the retention agreement, including once with the people most knowledgeable about Defendant's relevant electronic systems. The parties will address outstanding issues by email in the coming days and will file the retention agreement and proposed order by **August 9, 2023**.

On July 13, 2023, Defendant provided Plaintiff with a draft of the proposed retention agreement and order.

On July 20, 2023, the parties met telephonically to discuss the retention agreement and preservation of records stored in Defendant's electronic systems. During the meeting, the parties agreed that an informal conversation between Plaintiff's counsel and the people most knowledgeable about Defendant's electronic systems would be beneficial, but a Fed. R. Civ. P. 30(b)(6) deposition was not necessary in advance of filing the retention agreement.

On July 26, 2023, Plaintiff's counsel met with the people most knowledgeable about Defendant's electronic systems. Most of the preservation issues concerning the relevant electronic

systems were addressed during the meeting, but a few issues required follow-up. The parties will discuss those issues over email in the coming days.

Once those issues are resolved, the parties will revise the retention agreement and proposed order and file it with this Court by **August 9, 2023**.

Respectfully submitted,

Drew Legando (0084209)
MERRIMAN LEGANDO WILLIAMS & KLANG, LLC
1360 West 9th Street, Suite 200
Cleveland, Ohio 44113
T. (216) 522-9000
F. (216) 522-9007
E. drew@merrimanlegal.com

/s/ Akeeb Dami Animashaun

Akeeb Dami Animashaun
355 South Grand Avenue, Suite 2450
Los Angeles, California 90071
T. (929) 266-3971
E. animashaun@pm.me

Kate Schwartz
Caryn Lederer
Emily Brown
HUGHES SOCOL PIERS RESNICK & DYM LTD.
70 W. Madison Street, Suite 4000
Chicago, Illinois 60602
T. (312) 580-0100
E. kschwartz@hsplegal.com
clederer@ksplegal.com
ebrown@hsplegal.com

Lucy B. Bansal
Janet Herold
JUSTICE CATALYST LAW
40 Rector Street, Floor 9
New York, New York 10006
T. (518) 732-6703
E. lbansal@justicecatalyst.org
jherold@justicecatalyst.org

Counsel for Plaintiff & Proposed Class

/s/ Brendan D. Healy

BRENDAN D. HEALY (0081225)
bhealy@prosecutor.cuyahogacounty.us
Phone: (216) 698-6447
JAKE A. ELLIOTT (0093521)
jelliott@prosecutor.cuyahogacounty.us
Phone: (216) 443-5756
Cuyahoga County Prosecutor's Office
1200 Ontario Street, 8th Floor
Cleveland, Ohio 44113

Counsel for Defendant Cuyahoga County